

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

FILED

2006 JUL 25 P 5:30

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAY ANN SNYDER

and

MARK ESTELL WILKINS,

Defendants.

1:06-cr-

76

Judge

Collier/lee

INDICTMENT

COUNTS ONE AND TWO

[WIRE FRAUD]

18 U.S.C. § 1343

THE GRAND JURY CHARGES THAT:

A. THE FRAUD:

Beginning sometime in or about April 2001, and continuing until in or about at least January 2003, in the Eastern District of Tennessee and elsewhere, defendant JAY ANN SNYDER, aided, abetted, counseled, and induced by others, including defendant MARK ESTELL WILKINS, and others to the Grand Jury known and unknown, did devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, and with reckless disregard for the truth of such pretenses, representations and promises. The scheme and artifice to defraud and to obtain money so devised and intended to be devised by the defendants was in substance as follows:

1. It was a part of the scheme to defraud that defendant JAY ANN SNYDER would and did, while employed as a mortgage broker, create and cause to be created false settlement papers, including such documents as the Housing and Urban Development Settlement form, inflating the sales price of residential property.

2. It was further a part of the scheme to defraud that defendant JAY ANN SNYDER would and did knowingly misrepresent the down payments made by the borrowers, including the defendant MARK ESTELL WILKINS.

3. It was further a part of the scheme to defraud that defendant JAY ANN SNYDER would and did generate and cause to be generated inflated fees, service charges and commissions.

4. It was further a part of the scheme to defraud that defendant MARK ESTELL WILKINS would and did purchase a number of properties using the defendant JAY ANN SNYDER as the mortgage broker, knowing that she would cause a duplicate set of settlement papers to be prepared.

5. It was further a part of the scheme to defraud that defendants would and did cause the lender to loan more money than it otherwise would have loaned.

6. It was further a part of the scheme to defraud that defendants would and did split between each other the excess of funds received from the lenders and use those funds to purchase various items for their own benefit, such as all terrain vehicles.

7. It was further a part of the scheme to defraud that defendants would and did utilize an entity known as Century Processing to help disguise the receipt of the excess funds obtained pursuant to the scheme to defraud.

B. THE EXECUTION:

The Grand Jury charges that on or about the below listed dates in the Eastern District of Tennessee and elsewhere, the defendant, JAY ANN SNYDER, aided, abetted, counseled, and induced by others, including defendant MARK ESTELL WILKINS, did transmit and cause to be transmitted by means of wire communication in interstate commerce certain writings, signs, signals and sounds for the purpose of executing the scheme and artifice to defraud described in Part A above:

Count	Date	Property	Interstate Wire Communication From	Interstate Wire Communication To
1	July 25, 2001	3905 5 th Ave. Chattanooga, TN	Bankers Trust Company, New York, NY	SunTrust Bank, Chattanooga, TN
2	January 29, 2002	3115 14 th Ave. Chattanooga, TN	Michigan National Bank, Farmington Hills, MI	SunTrust Bank, Chattanooga, TN

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS THREE AND FOUR
18 U.S.C. § 1001

The Grand Jury charges that on or about the below-listed dates, in the Eastern District of Tennessee, in a matter within the jurisdiction of the United States Department of Housing and Urban Development ("HUD"), an agency and department of the United States, the defendants, JAY ANN SNYDER and MARK ESTELL WILKINS, each aided and abetted by the other, did knowingly and willfully make and cause to be made false, fraudulent and fictitious material statements and representations as set forth below:

Count	Date	Property	False Statement
Three	July 25, 2001	3905 Fifth Ave. Chattanooga, TN	Stated sales price \$54,000, but actual sales price \$37,500
Four	January 29, 2002	3115 14 th Ave. Chattanooga, TN	Stated sales price \$58,000, but actual sales price \$22,000

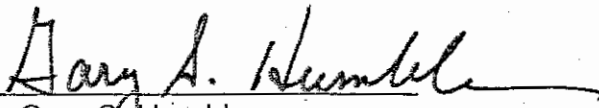
All in violation of Title 18, United States Code, Sections 1001 and 2.

A TRUE BILL:

s/GRAND JURY FOREPERSON
GRAND JURY FOREPERSON

JAMES R. DEDRICK
UNITED STATES ATTORNEY

By:


Gary S. Humble
Assistant U.S. Attorney